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April 23, 2015

VIA ECF & ELECTRONIC MAIL

Honorable Andrew L. Carter, Jr.
Thurgood Marshall U.S. Courthouse
40 Foley Square, Room 435
New York, NY 10007
Email: ALCarterNYSDChambers@nysd.uscourts.gov

Re: **In re North Sea Brent Crude Oil Futures Litig., No. 1:13-MD-02475 (ALC)**

Dear Judge Carter:

We represent Shell International Trading and Shipping Company Limited (“STASCO”) and Shell Trading (US) Company (“STUSCO”) in the above-referenced matter and write in response to the letter submitted earlier today by the Brent Trader Plaintiffs (“Plaintiffs”) requesting a modification of the briefing schedule on the motion to dismiss Plaintiffs’ Second Amended Complaint filed by STASCO and STUSCO on April 6, 2015.

STASCO and STUSCO believe that the parties should adhere to the schedule to which they previously agreed, which has been set by this Court’s Order. (Dkt. No. 339). Because one of the grounds for STASCO’s motion to dismiss is the fact that Plaintiffs failed to plead a basis for personal jurisdiction over STASCO, and because Plaintiffs are not entitled to jurisdictional discovery unless they have established a *prima facie* case for jurisdiction, we expect that the Plaintiffs’ responsive brief will address issues that are central to the matter that will be before the Court at the May 1, 2015 pre-motion conference. Thus, we believe it would be very helpful both for the Court and for STASCO to have the benefit of Plaintiffs’ response in advance of the conference, as would occur under the current briefing schedule. Under the well established standards articulated by this Court and others, Plaintiffs are not entitled to jurisdictional discovery. In the event the Court concludes otherwise, we are confident that the parties could work out an acceptable process for providing any supplemental briefing. However, for the reasons set forth in our letter to the Court dated April 16, 2015, we do not believe that will be necessary.

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Accordingly, STASCO and STUSCO respectfully suggest that the Court deny Plaintiffs' letter request to modify the schedule.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'SAR', with a long horizontal stroke extending to the right.

Steven A. Reed

cc: All counsel of record via ECF